

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SCOTT D.H. REDMAN, individually and on behalf))	
of all others similarly situated,)	
)	
Plaintiff,)	No. 11 C 9044
)	
v.)	Judge Grady
)	
TAKE CARE HEALTH SYSTEMS, LLC, a)	Magistrate Denlow
Delaware limited liability company, and)	
TAKE CARE HEALTH ILLINOIS, P.C.,)	
an Illinois corporation,)	
)	
Defendants.)	

**JOINT MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION SETTLEMENT AGREEMENT**

Plaintiff Scott D.H. Redman, on behalf of himself and a class of similarly-situated persons, and Take Care Health Systems, LLC and Take Care Health Illinois, P.C., by their undersigned counsel, and pursuant to Fed. R. Civ. P. 23(e), move this Court for preliminary approval of a proposed class action settlement. In support of this Motion, the parties respectfully state as follows:

1. The parties have reached a proposed class settlement of this lawsuit. A copy of the executed Class Action Settlement Agreement and Release is included herewith as **Exhibit 1** and expressly incorporated herein by reference.

2. Plaintiff submits separately a memorandum of law in support of this Joint Motion.

WHEREFORE, and for purposes of settlement only, the parties request that this Court enter the concurrently submitted proposed order: (1) preliminarily approving the terms of the Settlement Agreement; (2) approving the form and manner of notice to the proposed Settlement Class as set forth in the Settlement Agreement and directing that such notice be given; (3)

appointing Plaintiff's counsel as Settlement Class Counsel; and (4) setting this matter for a Fairness Hearing for consideration of the request for Final Approval of the proposed settlement and for entry of Final Judgment.

SCOTT D.H. REDMAN,
Plaintiff,

TAKE CARE HEALTH SYSTEMS, LLC,
and TAKE CARE HEALTH ILLINOIS, P.C.,
Defendants,

By: s/ Paul F. Markoff
One of his attorneys

By: s/ Bradley J. Andreozzi
One of its attorneys

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CERTIFICATE OF SERVICE

I certify that I served a copy of this *Joint Motion for Preliminary Approval of Class Action Settlement Agreement* on the following electronically by using the CM/ECF system on this 15th day of May, 2012:

Bradley J. Andreozzi (bradley.andreozzi@dbr.com)

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s/ Paul F. Markoff

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